



SEALED

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DEMETRIUS WARE,

Defendant.

**SEALED
CRIMINAL INDICTMENT**

Case No. 2:20-cr-29

VIOLATIONS:

18 U.S.C. §§ 922(g)(1), 922(g)(9), and
924(a)(2) – Prohibited Person in Possession
of a Firearm

18 U.S.C. §§ 922(q)(2)(A) and 924(a)(4) –
Possession of a Firearm in a School Zone

THE GRAND JURY CHARGES THAT:

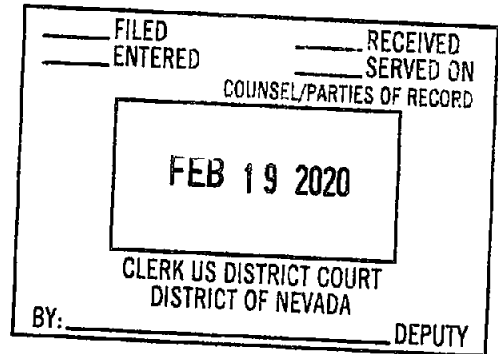
COUNT ONE

Prohibited Person in Possession of a Firearm
(18 U.S.C. §§ 922(g)(1), 922(g)(9), and 924(a)(2))

On or about December 11, 2019, in the State and Federal District of Nevada,

DEMETRIUS WARE,

the defendant herein, knowing he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: *Robbery*, in the Eighth Judicial District Court



1 in Clark County, Nevada, on or about September 16, 2014, in case number C-14-295335-1, and
 2 knowing he previously had been convicted of a misdemeanor crime of domestic violence, to wit:
 3 *Simple Battery Against Spouse, Cohabitant, or Fellow Parent* in the Superior Court of California for the
 4 County of Los Angeles, on or about June 4, 2012, in case number 2GN01848, did knowingly possess
 5 a firearm, to wit: a Ruger EC9s semiautomatic 9mm handgun, bearing serial number 454-58800,
 6 said possession being in and affecting interstate commerce and said firearm having been shipped
 7 and transported in interstate commerce, all in violation of Title 18, United States Code, Sections
 8 922(g)(1), 922(g)(9), and 924(a)(2).
 9

10 **COUNT TWO**

11 *Possession of a Firearm in a School Zone*
 12 (18 U.S.C. §§ 922(q)(2)(A) and 924(a)(4))

13 On or about December 11, 2019, in the State and Federal District of Nevada,

14 **DEMETRIUS WARE,**

15 the defendant herein, did knowingly possess a firearm, to wit: a Ruger EC9s semiautomatic 9mm
 16 handgun, bearing serial number 454-58800, that had moved in and affected interstate commerce,
 17 on the grounds of Harmon Elementary School located at 5351 Hillsboro Lane, Las Vegas, Nevada,
 18 a place that the defendant knew and had reasonable cause to believe was a school zone, in violation
 19 of Title 18, United States Code, Sections 922(q)(2)(A) and 924(a)(4).
 20
 21

22 **FORFEITURE ALLEGATION**

23 *Prohibited Person in Possession of a Firearm and Possession of a Firearm in a School Zone*

24
 25 1. The allegations of Counts One and Two of this Criminal Indictment are hereby
 26 realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18
 27 U.S.C. § 924(d)(1) with 28 U.S.C. § 2461(c).
 28

1 2. Upon conviction of any of the felony offenses charged in Counts One and Two of this
2 Criminal Indictment,

3 **DEMETRIUS WARE,**

4 defendant herein, shall forfeit to the United States of America, any firearm or ammunition
5 involved in or used in any knowing violation of 18 U.S.C. § 922(g)(1) and 922(g)(9) or any willful
6 violation of 18 U.S.C. § 922(q)(2)(A):
7

- 8 1. a Ruger EC9s semiautomatic 9mm handgun, bearing serial number 454-58800; and
9 2. any and all ammunition.

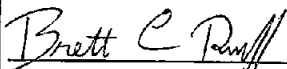
10 All pursuant to 18 U.S.C. § 922(g)(1), 922(g)(9), and 922(q)(2)(A) and 18 U.S.C. § 924(d)(1)
11 with 28 U.S.C. § 2461(c).
12

13
14 **DATED:** this 19th day of February, 2020.

15 **A TRUE BILL:**

16
17 /S/
18 FOREPERSON OF THE GRAND JURY

19 NICHOLAS A. TRUTANICH
20 United States Attorney

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22 BRETT C. RUFF
23 Assistant United States Attorney
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